

**Yvonne Tso**

Yvonne Tso is an expert for Direct Purchaser Plaintiffs in managed care with 30 years of health care-related experience. This includes working as a pharmacist, working for various Managed Care Organizations (“MCOs”), health plans and pharmacy benefit managers (“PBMs”), and consulting for the Centers for Medicare & Medicaid Services (“CMS”) (an agency of the U.S. Department of Health and Human Services) to administer the Medicare Advantage and Prescription Drug Program. Ms. Tso will offer the following opinions at trial:

- Reckitt’s Suboxone tablet withdrawal conduct, including Reckitt’s allegedly improper statements that Suboxone tablets had higher public health risks than Suboxone film, and Reckitt’s Suboxone tablet pricing tactics: (a) would have been relevant to the typical, reasonable MCO decision-maker’s decisions regarding Suboxone film and Suboxone tablet formulary placement; and (b) likely resulted in decisions that gave Suboxone film favorable formulary placement and blocked or restricted coverage for Suboxone tablets;
- Formulary changes that MCOs made prior to generic entry because of Reckitt’s challenged conduct: (a) made Suboxone tablets economically inaccessible to many patients; and (b) imposed costly administrative burdens on doctors, which had the purpose and effect of penalizing them for prescribing the “disadvantaged” Suboxone tablets;
- Absent Reckitt’s challenged conduct, Suboxone film would likely have received substantially less favorable formulary coverage and MCOs would likely not have implemented various types of formulary restrictions on Tablet coverage that forced patients to shift to film prior to generic entry; and
- Reckitt’s conduct prior to generic entry had the effect of entrenching Suboxone film in the market and impeding the sales of generic tablets after generic tablets entered the market, because the market conditions created by Reckitt’s conduct made it difficult (if not virtually impossible) for many MCOs to use normal, ordinary formulary tactics to shift patients to generic tablets once they entered the market.

Ms. Tso’s report is 80 pages. Reckitt offered no expert in response to Ms. Tso and so Ms. Tso did not file a rebuttal report.